

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
FRK OF COURT

2017 AUG 24 PM 3: 55

UNITED STATES OF AMERICA

v.

:

CASE NO
JUDGE

2 : 17 cr 192
Judge Watson

GREGORY R. LEE

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

GOVERNMENT'S PLEA AGREEMENT SUBMISSION
OF ELEMENTS AND PENALTIES FOR
18 U.S.C. §§ 2252(a) AND (e)

1. ELEMENTS: 18 U.S.C. §§ 2252(a) AND (e)

- First: The defendant employed, used, persuaded, induced, enticed or coerced, an individual to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct;
- Second: The individual so employed, used, persuaded, induced, enticed or coerced was under the age of 18 years at the time;
- Third: The visual depiction was produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer;
- Fourth: That such acts occurred in whole or in part in the Southern District of Ohio.

2. PENALTIES

- A. Mandatory Minimum: 15 years
Mandatory restitution pursuant to 18 U.S.C. § 2259
- B. Possible Maximum: 30 years in prison, a fine of \$250,000,
5 years to life supervised release,
and \$5,100 special assessment.

Forfeiture A
FORFEITURE: 18 U.S.C. §§ 2253(a)(1) and (3)

Upon conviction the defendant shall forfeit all computer and video equipment, child pornography and any property used or intended to be used in a child exploitation offense.

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

A handwritten signature in blue ink, appearing to read "Heather A. Hill", is written over a horizontal line.

HEATHER A. HILL (6291633)
Assistant United States Attorney
JENNIFER M. RAUSH (0075138)
Special Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
(614) 469-5715
Fax: (614) 469-5653
Heather.Hill@usdoj.gov